

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

In re:

RMS TITANIC, INC., *et al.*¹

Case No. 3:16-bk-02230-PMG
Chapter 11

Debtors.

(Jointly Administered)

/

NOTICE OF APPEARANCE

Greenberg Traurig, P.A. files its appearance in the above-captioned jointly administered cases on behalf of secured creditors Lange Feng, Haiping Zou, Jihe Zhang (the “**Secured Creditors**”) and equity holder High Nature Holdings Limited (“**High Nature**,” and together with the Secured Creditors, the “**Investors**”), and requests pursuant to Bankruptcy Rules 2002 and 9010(b) and section 1109(b) of the Bankruptcy Code, that all notices given or required to be given and all papers served in this case be delivered and served upon the attorneys identified below at the following addresses:

Scott M. Grossman, Esq.
GREENBERG TRAURIG, P.A.
401 East Las Olas Blvd., Suite 2000
Fort Lauderdale, FL 33131
Telephone: 954.768.5212
grossmansm@gtlaw.com

-and-

Ari Newman, Esq.
GREENBERG TRAURIG, P.A.
333 S.E. 2nd Ave., Suite 4400
Miami, FL 33131
Telephone: 305-579-0500
newmanar@gtlaw.com

¹ The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867), and Dinosaurs Unearthed Corp. (7309). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

This entry of appearance does not constitute a consent to the jurisdiction of the Bankruptcy Court, nor is it a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) the right to have a district judge hear and determine core matters that are beyond the adjudicatory authority of the bankruptcy court; (iii) the right to a trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iv) the right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Investors are or may be entitled under agreement, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 28, 2016.

Respectfully submitted,

GREENBERG TRAURIG, P.A.
Attorneys for the Investors
401 East Las Olas Blvd., Suite 2000
Fort Lauderdale, FL 33301
Telephone: 954-765-0500

By: /s/ Scott M. Grossman
SCOTT M. GROSSMAN
Florida Bar No. 0176702
grossmansm@gtlaw.com

-and-

Ari Newman, Esq.
newmanar@gtlaw.com
GREENBERG TRAURIG, P.A.
333 S.E. 2nd Ave., Suite 4400
Miami, FL 33131
Telephone: 305-579-0500

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2016, I electronically filed the foregoing Notice of Appearance with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the Service List below, either via transmission of Notices of Electronic Filing generated by CM/ECF or by first class U.S. mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Scott M. Grossman

Scott M. Grossman

SERVICE LIST

Daniel F. Blanks
Lee D. Wedekind, III
50 N. Laura Street, Suite 4100
Jacksonville, Florida 32202
(904) 665-3656 (direct)
(904) 665-3699 (fax)
daniel.blanks@nelsonmullins.com
lee.wedekind@nelsonmullins.com
Attorneys for Debtors and Debtors in Possession

William R. Poynter, Esq.
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
(757) 238-6383
(757) 304-6175 (fax)
wpoynert@kaleolegal.com
Attorneys for RMS Titanic, Inc.

Brian A. Wainger, Esq.
Kaleo Legal
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
(757) 965-6804
(757) 304-6175 (fax)
bwainger@kaleolegal.com
Attorneys for RMS Titanic, Inc.

David W. Baddley, Esq.
U.S. Securities and Exchange Commission
Office of Reorganization
950 E. Paces Ferry Road, NE, Suite 900
Atlanta GA 30326
(404) 842-7625
(404) 842-7633 (fax)
atitreorg@sec.gov
Attorneys for U.S. Securities and Exchange Commission

Jay B. Verona, Esq.
Shumaker, Loop & Kendrick, LLP
101 E. Kennedy Blvd., Suite 2800
Tampa, FL 33602
(813) 229-7600
(813) 229-1660 (fax)
jverona@slk-law.com
Attorneys for George F. Eyde Orlando, LLC and Louis J. Eyde Orlando, LLC

United States Trustee
Middle District of Florida
400 W. Washington Street, Suite 1100
Orlando FL 32801
USTP.Region21.OR.ECF@usdoj.gov

Scott M. Grossman, Esq.
Greenberg Traurig
401 East Las Olas Boulevard, Suite 2000
Fort Lauderdale, FL 33301
(954) 768-5212
(954) 765-1477 (fax)
grossmansm@gtlaw.com
*Attorneys for Lange Feng, Haiping Zou,
Jihe Zhang and High Nature Holdings
Limited*

JASON B. BURNETT
ALEXANDRIA V. HILL
Florida Bar No.: 84772
50 North Laura Street, Suite 1100
Jacksonville, Florida 32202
Telephone: (904) 598-9929
Facsimile: (904) 598-9109
*Attorneys for 417 Fifth Avenue Real Estate,
LLC*

Internal Revenue Service
Centralized Insolvency Operations
600 Arch Street
Philadelphia PA 19106

Lange Feng
Jihe Zhang
Haiping Zou
15953 107th Avenue
Surrey, BC V4N 5N7

417 Fifth Ave Real Estate LLC
c/o Sebastian Capital, Inc.
417 Fifth Avenue
New York, New York 10016

ABC Imaging
1155 21st Street NW, Suite M
Washington, DC 20036

Scott E. Bomkamp, Trial Attorney
Indiana Bar No.: 28475-49
Office of the United States Trustee
U.S. Department of Justice
George C. Young Federal Building
400 W. Washington St., Suite 1100
Orlando, FL 32801
Telephone No.: (407) 648-6301, Ext. 150
Facsimile No.: (407) 648-6323
Email: scott.e.bomkamp@usdoj.gov

Broadway Video
30 Rockefeller Plaza, 54th Floor
New York, NY 10112

CBS Outdoor/Outfront Media
185 US Highway 48
Fairfield, NJ 07004

Dentons Canada LLP
77 King Street West, Suite 400
Toronto, ON M5K 0A1

Hoffen Global Ltd.
305 Crosstree Lane
Atlanta, GA 30328

NASDAQ Stock Market, LLC
805 King Farm Blvd.
Rockville, MD 28050

New York Dept. of Taxation and Finance
ATTN: Office of Counsel
Building 9, W. A. Harriman Campus
Albany, NY 12227

National Oceanic and
Atmospheric Administration
1401 Constitution Avenue NW
Room 5128
Washington, DC 20230

PacBridge Limited Partners
22/F Fung House
19-20 Connaught Road
Central, Hong Kong

Ramparts, Inc.
d/b/a Luxor Hotel and Casino
3900 Las Vegas Blvd. South
Las Vegas, NV 89119

Screen Actors Guild
1900 Broadway, 5th Floor
New York, NY 10023

Seaventures, Ltd.
5603 Oxford Moor Blvd.
Windemere, FL 34786

Soprintendenza Archeologica
di Napoli e Pompei
Piazza Museo 19
Naples, Italy 80135

Structure Tone, Inc.
770 Broadway, 9th Floor
New York, NY 10003

TPL
3340 Peachtree Road, Suite 2140
Atlanta, GA 30326

United States District Court
Eastern District of Virginia
Attn: Chief Judge Rebecca Beach Smith
600 Granby Street
Norfolk, VA 23510

Verifone, Inc.
300 S. Park Place Blvd.
Clearwater, FL 33759

WNBC
NBC Universal Media
15000 SW 27th Street
Hollywood, FL 33027

Zigong Gengu Longteng Science
& Technical Co.
No. 10-4 TaiFeng Bldg.
68 HuiDong Road
Zigong, Sichuan Province, China 643000

Samuel Weiser
565 Willow Road
Winnetka, IL 60093

FTL 110763721v3